

McCandless, George

From: Greg Holmes [GHolmes@dtsc.ca.gov]
Sent: Friday, November 17, 2006 4:13 PM
To: Linda Beresford
Cc: Bonnie Wolstoncroft; Caren Trgovcich; Greg Sweel; Loveriza Sarmiento; Thomas Cota; ropper@envirolawyer.com; McCandless, George; John Anderson
Subject: Re: Memo re North Park Renaissance Project in San Diego

Linda,

DTSC's preliminary draft comments on the Renaissance at North Park Closure Report are as follows:

1. In the burn pit area, soil with lead levels up to 2,190 mg/kg was excavated and disposed of at an unnamed "industrial facility" near the Mexican border. Since TTLC for lead is 1,000 mg/kg, at least some of the soil met hazardous waste levels, indicating potential illegal transportation and disposal of hazardous waste. Aside from that, how has this offsite soil pile been addressed? Is it still there?
2. There is no mention of sampling for dioxin at the burn pit area. How was the potential presence of dioxin ruled out?
3. The Remedial Action Work Plan described choosing soil sampling locations based on field screening by XRF. However, it appears this procedure was not followed and the 38 soil sample locations were randomly chosen instead.
4. The Work Plan states that areas would be considered "clean" when no more than 50 mg/kg of soil remained. However, it appears that concentrations greater than this level were left at the site. One sample from the graded area showed a lead level of 200 mg/kg (above the U.S. EPA PRG of 150). There is no discussion of any step-out sampling or additional excavation in that area, or other area where lead concentrations over 50 mg/kg were apparently left in place.

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>>> "Linda Beresford" <lindab@envirolawyer.com> 11/17/2006 10:04:47 AM

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Hello Greg,

Will we be receiving a memo discussing any concerns you may with this project today? It would be extremely helpful to have this information

in advance of our meeting Monday.

Thanks.

Linda

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